ROP Communication Activities

As part of the Reactor Oversight Process (ROP) pilot program in 1999, the staff developed a communication plan to describe the key messages and the methods for communicating the ROP with internal and external stakeholders. The staff has updated the plan annually since initial implementation of the ROP in April 2000. The primary objective of the ROP Communication Plan is to deliver consistent and accurate information about the ROP to all stakeholders in a timely fashion, and to solicit stakeholder input and feedback on potential process improvements.

The staff issued the "Reactor Oversight Process Communication Plan for Calendar Year 2002" on November 21, 2001, to describe the approaches for facilitating communication regarding execution and continual refinement of the ROP. The plan describes ongoing activities to meet the following objectives:

- provide accurate, pertinent and timely information to all stakeholders
- gather and appropriately respond to stakeholder feedback
- maintain ongoing, positive interactions with all stakeholders
- collect and analyze pertinent information to make appropriate process adjustments
- enhance public confidence in the ROP

The staff effectively implemented the ROP Communication Plan in 2002 and has continued its focus on stakeholder involvement. Several highlights from this past year are discussed below.

Internal Stakeholder Interface

The program office staff continued to conduct biweekly conference calls with regional division level and branch level management to discuss current issues associated with the oversight process. In addition, the program office staff met periodically with regional managers to discuss more complex ROP topics and issues. The program office staff also conducted visits to the regions to provide regional staff and management the opportunity to discuss the status of the ROP and current issues. In addition, the Efficiency Focus Group and the Significance Determination Process (SDP) Task Group, consisting of an array of internal stakeholders, were formed to address specific issues as discussed in other sections of this paper.

The ROP feedback process continued to provide a means for staff to identify concerns or issues and propose recommended improvements related to ROP policies, procedures, or guidance. Informal feedback from staff and regional management indicates that feedback responsiveness and timeliness has improved; improvements in timeliness are due in part to weekly management meetings that emphasize reducing the backlog of feedback forms and providing clear and timely responses. Regional staff had requested access to the feedback database to view open and closed feedback forms. An interactive database was scheduled for development in late fiscal year (FY) 2002 to accommodate this request, but was not completed and has been deferred as a priority for FY 2003. During this period, the staff received 103 feedback forms and closed 146 feedback forms. Although feedback responsiveness and timeliness have improved, feedback from internal stakeholders indicates that further

enhancements are warranted. The staff intends to evaluate a re-engineering of this process to improve its efficiency and effectiveness in addressing internal stakeholder feedback.

External Stakeholder Interface

The staff continued to conduct routine, public working-level meetings with the Nuclear Energy Institute (NEI), the industry, and other stakeholders to discuss the status and ongoing refinements to the ROP on an approximate monthly basis. The staff also sponsored the annual Regulatory Information Conference in April 2002 to provide opportunities for Nuclear Regulatory Commission (NRC) management, its regulated utilities, and other interested stakeholders to meet and communicate directly regarding safety initiatives and regulatory trends. In addition, the NRC sponsored a public workshop to discuss and promulgate information regarding the Mitigating Systems Performance Index (MSPI) pilot program in July 2002. The staff also instituted a direct feedback mechanism through the ROP Web page as discussed below, and administered an external ROP survey as discussed below.

Internal and External Surveys

The staff conducted both internal and external surveys this past year to actively solicit and analyze stakeholder feedback regarding the effectiveness of the ROP. The staff administered an internal survey in late calendar year (CY) 2002 and received a total of 236 anonymous responses. NRC stakeholder participation included resident/senior resident inspectors, region-based inspectors and staff, senior reactor analysts, regional and headquarters line management, and headquarters technical and program staff employees. Using the computer-based survey, the respondents selected from five possible answers (strongly agree, agree, disagree, strongly disagree and unable to answer) to several specific questions and were provided space to amplify the responses or make additional comments. The detailed analysis of the internal survey is included in Attachment 5 to this paper, and specific issues are addressed in the applicable portions of the program area discussions (i.e., performance indicators, inspection, SDP, and assessment) as well as in the ROP performance metric report in Attachment 3. In addition, the staff has initiated an analysis of the individual written survey comments submitted by internal stakeholders. This analysis will identify the underlying programmatic themes, and may result in future improvements to ROP procedures and processes as well as changes to inspector training. This analysis is expected to be completed in June 2003.

In addition, a *Federal Register* notice (FRN) was issued on November 22, 2002, to obtain external stakeholder input regarding the efficacy of the ROP. The FRN requested responses to 20 specific questions corresponding to specific ROP performance metrics as defined in Inspection Manual Chapter (IMC) 0307, “Reactor Oversight Process Self-Assessment Program.” The NRC received comments from the 19 external individuals and/or organizations as delineated in the following list (in chronological order as received). Accession numbers from the Agencywide Documents Access and Management System (ADAMS) are also included after each respondent for access to the official record copy of the specific FRN response.

- S. Kasturi, Private Citizen (ADAMS accession number ML023370531)
- Union of Concerned Scientists (ML023540345)
- Tennessee Valley Authority (ML023540343)
- Nuclear Information and Resource Service (ML023600020)
- Florida Power and Light Company (ML030020484)
- The State of New Jersey, Department of Environmental Protection (ML030020491)
- Winston & Strawn (ML030070012)
- Constellation Energy Group (ML030020498)
- Nuclear Energy Institute (ML030020503)
- The State of Illinois, Department of Nuclear Safety (ML030020508)
- Southern California Edison (ML030070014)
- The State of Pennsylvania, Department of Environmental Protection (ML030070024)
- New England Coalition on Nuclear Pollution (ML030070030)
- Strategic Teaming and Resource Sharing (ML030070032)
- The State of Arizona, Division of Energy Management (ML030070039)
- Entergy (ML030090389)
- Dominion Generation (ML030090398)
- Greenpeace (ML030090392)
- Exelon Nuclear (ML030150318)

In addition, the detailed comments are consolidated into a summary document (ADAMS accession number ML030620007) with the comments received in their entirety following each of the 20 questions. Staff analysis of the specific responses is also included in the applicable portions of the program area discussions in this paper as well as in the ROP performance metric report in Attachment 3.

Although several of the survey responses were positive, the staff is concerned that a number of the responses were critical, and some indicated a negative perception when compared to previous surveys. As previously noted, these perceptions were primarily due to concerns over the Davis-Besse reactor vessel head degradation and the complexity of the SDP process. As a result, the staff is currently analyzing the primary themes and evaluating the need and feasibility for a public workshop in CY 2003 to address several of the common concerns noted by both the internal and external stakeholders.

Interface with the Advisory Committee on Reactor Safeguards (ACRS)

Over the past year, the staff has frequently interacted with the ACRS on matters related to the ROP, such as the status of the Industry Trends Program, the MSPI pilot program, and other ROP initiatives. The staff also briefed the ACRS Plant Operations Subcommittee on September 9, 2002, to discuss the staff's plans to address issues raised in a Staff Requirements Memorandum (SRM) after the ACRS briefing of the Commission on
December 5, 2001. The SRM, dated December 20, 2001, stated that "the staff, with ACRS input, should provide recommendations for resolving, in a transparent manner, apparent conflicts and discrepancies between aspects of the revised reactor oversight process that are risk-informed (e.g., the significance determination process) and those that are performance-based (e.g., the performance indicators)." As a result of the September 9 briefing, the staff decided to prepare a written response to address the specific issues raised at the September 9 ACRS briefing and in an

ACRS letter dated February 13, 2002. The staff's response to the ACRS (ADAMS accession number ML023610493), dated December 19, 2002, is summarized below.

The staff met again with the ACRS Plant Operations Subcommittee on January 21, 2003, to further discuss the written response and the subject SRM, and to present the staff's position and plans regarding the specific concerns from the September 2002 briefing. Accordingly, the staff and the subcommittee discussed the ACRS concerns regarding the subject SRM, the usefulness of the risk-informed performance indicator thresholds, and the assessment of concurrent findings. The staff also provided detailed presentations by the subject matter experts to demonstrate several greater-than-green examples and their basis. Most recently, the staff briefed the ACRS Full Committee on March 6, 2003, and summarized its position as noted in the December 2002 response and discussed during the January 2003 subcommittee briefing.

As detailed in the staff's written response, the staff's position is that the ROP should continue to be implemented in its current form, though incremental improvements are warranted and under consideration. The staff believes that the ROP is working effectively and that plants are receiving the appropriate level of oversight. The staff does not acknowledge any fundamental flaws in the process that would prevent the staff from continuing to successfully implement the ROP. The staff recognizes that there are differences between the risk-informed and strictly performance-based inputs to the ROP; however, the staff believes that the ROP appropriately addresses both risk-informed and performance-based issues and that the ROP inputs provide the necessary information to determine and initiate the appropriate regulatory response. However, the staff acknowledged the need for a central document to consolidate the basis for the PIs, SDPs, and other ROP aspects in a more transparent manner, and has issued the ROP Basis Document to address this need. In addition, the staff expects to make continued incremental improvements to the ROP via the ongoing self-assessment process, and anticipates several process improvements in the upcoming months based on recommendations from the Davis-Besse Lessons Learned Task Force and the SDP Task Group. In the longer term, the staff also plans to explore the potential use of structured decision analysis in the ROP.

As a result of the March 6 briefing, the ACRS forwarded a letter to the Commission on March 13, 2003, concluding that there are still disagreements between the staff and the ACRS. The specific issues presented in the March 13 letter will serve as the basis for further discussion and potential revisions to the ROP.

ROP Web Page Enhancements

The staff continued to make improvements to the ROP Web pages to ensure that they were useful tools for communicating accurate and timely ROP information to all stakeholders. For example, the staff corrected a PI reporting discrepancy in which licensee PI submittals would inadvertently overwrite historical information on the ROP Web page when removing fault exposure hours from safety system unavailability PIs. This effort involved revising the algorithms and the reporting protocol, testing the amended process, and documenting the change in a Regulatory Issue Summary.

The staff also added direct feedback access from the ROP Web page to the implementing office and has responded to several questions and concerns regarding the ROP. Another key

improvement to the ROP Web page was to add access to historical ROP information from previous quarters. These historical snapshots of plant performance include the individual plant performance summaries, inspection findings, and performance indicators, as well as the comprehensive summaries of the action matrix designation, inspection findings, and performance indicators for all plants.

In addition, the staff provided background information and online registration for the MSPI workshop in July 2002 and added a new page for the MSPI Pilot Program. The staff also provided a temporary link from the ROP Web page to the FRN that requested feedback from the public and other external stakeholders.

Several months prior to initial implementation of the ROP, the staff recognized the need to establish an internal NRC Web site to consolidate and provide pertinent information to inspectors in a timely manner. This site had been routinely updated and included the latest guidance, draft information, feedback forms, and program office points of contact. Unfortunately, this internal site was not adequately maintained in early CY 2002 due to competing priorities and our internal stakeholders lost confidence in the site as a reliable source of ROP information. The staff has recognized the usefulness and importance of this internal communication tool and has committed dedicated resources to the reconstitution and maintenance of this site. Accordingly, the information on the internal ROP Web site was recently updated, and the staff continues to maintain the accuracy of the information and make refinements to improve the site's effectiveness. The staff plans to continue to utilize the ROP Web pages as an effective and efficient communication tool.

Electronic Support System for Inspectors

In an effort to increase inspector efficiency and provide real-time and historical data, the staff is planning to develop an electronic support system for inspectors. This system would provide inspectors immediate access to a full range of information, information technology (IT) tools, and computer-based training. The framework for this system may include, but is not limited to, links to historical lessons learned, exemplary inspection findings, significant human performance issues, operating experience, technical information, good inspection techniques, and just-in-time computer-based training. The staff's goal is to help inspectors perform their jobs more successfully by providing a knowledge transfer tool in an inspector-centric, usable format. In addition, the staff launched an electronic newsletter in January 2003 that showcases regional best practices and provides information of current interest to inspectors.

The staff recently completed two pilot programs in FY 2002 utilizing IT technology. The objective of the first pilot was to determine the suitability of the personal digital assistant (PDA) as an electronic reference and personal productivity tool. This pilot consisted of two inspectors from each region. Based on survey data and conference calls with participants, the PDA pilot objective was met and the program was successful. The results of this pilot indicated the PDA increased efficiency in note taking, scheduling, and organizing work. The other pilot utilized pen scanner technology. This pilot consisted of ten participants, eight of whom indicated they believed efficiencies were gained by using the scanner. Both of these pilots were partnered with Region II and the Office of the Chief Information Officer (OCIO). Data gathered for these pilots clearly

demonstrates that efficiencies were realized by the use of IT tools. Cost and budget evaluations are now being conducted.

The staff is also planning to develop a pilot for on-demand training for inspectors. This training will be organized by inspection procedure and will serve as supplemental on-the-job training or as refresher training.